

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHEVRON CORPORATION,

Plaintiff,

v.

STEVEN DONZIGER *et al.*,

Defendants.

11-CV-0691

The Honorable Lewis A. Kaplan, U.S.D.J.  
The Honorable James C. Francis, U.S.M.J.

**DECLARATION OF STEVEN R. DONZIGER IN SUPPORT OF DEFENDANTS’  
MOTION TO IMPOSE TERMINATING SANCTIONS BASED ON PLAINTIFF  
CHEVRON CORPORATION’S REPEATED EFFORTS TO CORRUPT WITNESS  
TESTIMONY IN THIS PROCEEDING**

I, STEVEN R. DONZIGER, hereby declare under penalty of perjury pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1. Attached hereto as Exhibit 1 is a true and correct (redacted) copy of the transcript of the deposition of Alberto Guerra Bastidas taken May 2, 2013.
2. Attached hereto as Exhibit 2 is a true and correct copy of the Declaration of Erwin Chemerinsky dated July 26, 2013.
3. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiffs’ Response in Opposition to Dole Food Company, Inc. and The Dow Chemical Company’s Motion for Entry of Protective Order Pursuant to F.R.C.P. 26(c), Dkt. No 259, *Osorio et al. v. Dole Food Company, Inc., et al.*, Case No. 07-cv-22693-PCH (S.D. Fla. Jun. 25, 2009).

4. Attached hereto as Exhibit 4 is a true and correct copy of the Declaration of Claudia Patricia Salazar Maineri, Dkt. No 260-10, *Osorio et al. v. Dole Food Company, Inc., et al.*, Case No. 07-cv-22693-PCH (S.D. Fla. Jun. 25, 2009).
5. Attached hereto as Exhibit 5 is a true and correct copy of the Declaration of Guillermo Arnoldo Hernandez, Dkt. No 260-8, *Osorio et al. v. Dole Food Company, Inc., et al.*, Case No. 07-cv-22693-PCH (S.D. Fla. Jun. 25, 2009).
6. Attached hereto as Exhibit 6 is a true and correct copy of the Declaration of Irvin Jacinto Castro, Dkt. No 260-3, *Osorio et al. v. Dole Food Company, Inc., et al.*, Case No. 07-cv-22693-PCH (S.D. Fla. Jun. 25, 2009).
7. Attached hereto as Exhibit 7 is a true and correct copy of the Declaration of Jose Francisco Palacios Ramos, Dkt. No 260-6, *Osorio et al. v. Dole Food Company, Inc., et al.*, Case No. 07-cv-22693-PCH (S.D. Fla. Jun. 25, 2009).
8. Attached hereto as Exhibit 8 is a true and correct copy of the Declaration of Juan Alberto Herrera Nuñez, Dkt. No 260-8, *Osorio et al. v. Dole Food Company, Inc., et al.*, Case No. 07-cv-22693-PCH (S.D. Fla. Jun. 25, 2009).
9. Attached hereto as Exhibit 9 is a true and correct copy of the Declaration of Juan Ramon Ruiz Torres, Dkt. No 260-7, *Osorio et al. v. Dole Food Company, Inc., et al.*, Case No. 07-cv-22693-PCH (S.D. Fla. Jun. 25, 2009).
10. Attached hereto as Exhibit 10 is a true and correct copy of the Declaration of Maxel Leonel Delgado Montiel, Dkt. No 260-7, *Osorio et al. v. Dole Food Company, Inc., et al.*, Case No. 07-cv-22693-PCH (S.D. Fla. Jun. 25, 2009).

11. Attached hereto as Exhibit 11 is a true and correct copy of the Declaration of Pablita Raquel Salinas Hernandez, Dkt. No 260-5, *Osorio et al. v. Dole Food Company, Inc., et al.*, Case No. 07-cv-22693-PCH (S.D. Fla. Jun. 25, 2009).
12. Attached hereto as Exhibit 12 is a true and correct copy of the Declaration of Benton Musslewhite, Dkt. No 260-9, *Osorio et al. v. Dole Food Company, Inc., et al.*, Case No. 07-cv-22693-PCH (S.D. Fla. Jun. 25, 2009).
13. Attached hereto as Exhibit 13 is a true and correct copy of the Declaration of Mark Sparks, Dkt. No 260-1, *Osorio et al. v. Dole Food Company, Inc., et al.*, Case No. 07-cv-22693-PCH (S.D. Fla. Jun. 25, 2009).
14. Attached hereto as Exhibit 14 is a true and correct copy of Appellants' Opening Brief in *Jose Antonio Rojas Laguna, et al., v. Dole Food Company, Inc. et al.*, Case No. B233497 (Cal. Ct. App., Apr. 14, 2012).
15. Attached hereto as Exhibit 15 is a true and correct copy of the deposition of Douglas Beltman taken September 9, 2011.

Executed on this 12th day of September 2013 at New York, New York.

/s/ Steven R. Donziger  
Steven R. Donziger